

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KIRA WAHLSTROM,

Plaintiff,

v.

C.A. NO. 1:22-cv-10792-RGS

DAVID J. HOEY, LAW OFFICES OF
DAVID J. HOEY, P.C., DON C. KEENAN,
D.C. KEENAN & ASSOCIATES, P.C. d/b/a
THE KEENAN LAW FIRM, P.C., AND
KEENAN'S KIDS FOUNDATION, INC.,

Defendants.

**JOINT MOTION OF ALL PARTIES FOR A TEN-DAY EXTENSION OF THE
DEADLINE FOR DISCLOSURE OF EXPERT REPORTS**

The parties jointly move for an order extending by ten days, from June 12 to June 22, the deadline by which they must produce their expert reports. The parties do not seek to move any of the later procedural deadlines as to depositions, Daubert motions, or summary judgment motions. In support of this Motion, the parties state that the requested extension will assist them and their experts in completing their work, and the extension will not delay resolution of the matter.

KIRA WAHLSTROM,
By Her Attorneys,

/s/ Bridget A. Zerner

Bridget A. Zerner, Esq.
John J.E. Markham, II, Esq.
Markham Read Zerner LLC
Once Commercial Wharf West
Boston, MA 02110
bzerner@markhamreadzerner.com
jmarkham@markhamreadzerner.com

KEENAN'S KIDS FOUNDATION, INC.,
By Their Attorneys,

/s/ Danni L. Shanel

John Bowler, Esq.
William M. Taylor, Esq.
Danni Shanel, Esq.
Troutman Pepper Hamilton Sanders
125 High Street, 19th Floor
Boston, MA 02110
william.taylor@troutman.com
danni.shanel@troutman.com

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DON C. KEENAN AND
D.C. KEENAN & ASSOCIATES, P.C.
d/b/a THE KEENAN LAW FIRM, P.C.,
By their Attorneys,

/s/ John J. O'Connor

John J. O'Connor
BBO # 555251
Kristyn K. St. George
BBO #693787
PEABODY & ARNOLD, LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210-2261
Phone: (617) 951-2100
Fax: (617) 951-2125
jconnor@peabodyarnold.com
kstgeorge@peabodyarnold.com

DAVID J. HOEY, LAW OFFICES OF
DAVID J. HOEY, P.C.,
By His Attorneys,

/s/ Christine Knipper

Christine Knipper, Esq.
Thomas A. Murphy, Esq.
Wilson, Elser, Moskowitz & Dicker, LLP
260 Franklin Street, 14th Floor
Boston, MA 02110
christine.knipper@wilsonelser.com
thomas.murphy@wilsonelser.com

CERTIFICATE OF SERVICE

I, John J. O'Connor, hereby certify that a copy of the foregoing document has been served via email on this 9th day of June, 2023 to:

Bridget A. Zerner, Esq.
John J.E. Markham, II, Esq.
Markham Read Zerner LLC
Once Commercial Wharf West
Boston, MA 02110
bzerner@markhamreadzerner.com
jmarkham@markhamreadzerner.com

Christine Knipper, Esq.
Thomas A. Murphy, Esq.
Wilson, Elser, Moskowitz & Dicker, LLP
260 Franklin Street, 14th Floor
Boston, MA 02110
christine.knipper@wilsonelser.com
thomas.murphy@wilsonelser.com

John Bowler, Esq.
William M. Taylor, Esq.
Danni Shanel, Esq.
Troutman Pepper Hamilton Sanders
125 High Street, 19th Floor
Boston, MA 02110
william.taylor@troutman.com
danni.shanel@troutman.com

/s/ John J. O'Connor

John J. O'Connor

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